

## **Remarks**

Claims 166-185 currently stand rejected and remain pending in the application. Claims 1-165 were previously canceled. No claims are amended herein. The Applicant respectfully traverses the rejections and requests allowance of claims 166-185.

### **Rejections under 35 U.S.C. §§ 102 and 103**

Claims 166, 168-172, 176, and 178-182 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,687,241 to Goss (hereinafter “Goss”). (Page 3 of the Office action.)

Claims 167 and 177 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Goss in view of U.S. Patent No. 6,836,476 to Dunn et al. (hereinafter “Dunn”). (Page 8 of the Office action.)

Claims 173 and 183 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Goss in view of U.S. Patent Application Publication No. 2002/0021693 to Bruno et al. (hereinafter “Bruno”). (Page 9 of the Office action.)

Claims 174 and 184 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Goss in view of U.S. Patent No. 6,826,194 to Vered et al. (hereinafter “Vered”). (Page 10 of the Office action.)

Claims 175 and 185 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Goss in view of U.S. Patent No. 7,536,002 to Ma et al. (hereinafter “Ma”). (Page 12 of the Office action.)

The Applicant respectfully traverses the rejections in light of the following discussion.

Generally, Goss discloses “an Enterprise Contact Server that enables customers to submit call-back requests to agents located at any one of a plurality of call centers via the Internet, or virtually any other communications technology available. A call-back to the customer can be placed via any communications technology available.” (Abstract.) A “selected qualified agent located at one of the plurality of call-back contact centers” ... “*can then place a telephone call* to the number provided by the customer who submitted the call-back request....” (Abstract; emphasis supplied.) In other words, *the agent*

*ultimately responding to the request originates a call to the customer requesting the call-back.*

Regarding independent claims 166 and 176, the Office action alleges Goss teaches “receiving the voice call originating from the user device including the cookie.” (Page 3 and 5 of the Office action.) Further, the Office action alleges that “Goss teaches a Web Server and Enterprise Contact Server receiving a voice over IP (VOIP) request from a customer. Cookies are used to identify the customer and match the request to a qualified agent.” (Id.)

The Applicant respectfully disagrees with the allegations. Goss mentions the use of cookies only with respect to a user submitting a contact request by way of *a web page accessed via a web browser*. (See column 7, lines 51-61.) Thus, the Goss contact request in this case does not involve a voice call. Therefore, Goss does not teach or suggest “*receiving the voice call* originating from the user device including the cookie,” as set forth in claims 166 and 176, and such indication is respectfully requested.

The Office action further asserts that Goss teaches “routing the voice call originating from the user device to the selected one of the call center resources.” (Pages 3 and 6 of the Office action.) More specifically, the Office action asserts that “Goss teaches routing the VOIP request to a call center having a qualified agent to handle the request.” (Id.) For support, the Office action cites column 5, lines 11-15; column 9, lines 1-5, 66, and 67; and column 10, lines 1-4. (Id.)

The Applicant respectfully disagrees with these assertions. Apparently, the Office action is attempting to combine the functionality of the Goss Enterprise Voice Response Unit (VRU) to direct voice calls received over a public switched telephone network (PSTN), as discussed in column 5, with the functionality of the Goss Enterprise Contact Server to service call-back requests, as mentioned in columns 9 and 10. More specifically, the VRU, by way of its voice link to the PSTN, may be configured so that “any calls *received over the PSTN* 20 can be routed to any ACD [Automatic Call Distributor] at any call center.” (Column 4, lines 54 and 55.) However, since such calls are received over the PSTN, Goss does not teach or suggest that such calls involve cookies at all, but instead employs data received from a PSTN switch, as well as data

entered by the caller via the VRU, to direct the call. (See column 5, line 40, to column 6, line 11.)

Separately, the Enterprise Contact Server handles customer contact or call-back requests, such as web page accesses. (See Figs. 3(a)-3(c), and column 7, line 34, to column 10, line 25.) Although the call-back request is ultimately transferred to the agent, *the request does not constitute a voice call routed to the agent. Otherwise, the agent would not need to call the customer back. Only after the transfer of the call-back request initiated by the customer* does an agent then call back the customer using information associated with the call-back request. Further, the only reference to cookies in Goss appears to involve maintaining a session with the customer web browser while the contact request is being made (column 7, lines 62-67), and thus not with respect to routing a voice call originating from the user device. Thus, the Applicant respectfully contends that Goss does not teach or suggest “processing the cookie from the user device to select one of the call center resources; and routing the voice call originating from the user device to the selected one of the call center resources,” as set forth in claim 166.

The Office action employs the same rationale in rejecting independent claim 176. (Pages 5 and 6 of the Office action.) Thus, the Applicant respectfully asserts that claim 176 is allowable for at least the same reasons presented above in support of claim 166, and such indication is respectfully requested.

Claims 167-175 depend from independent claim 166, and claims 177-185 depend from independent claim 176, thus incorporating the provisions of their respective independent claims. Thus, the Applicant asserts that claims 167-175 and 177-185 are allowable for at least the reasons provided above in support of claims 166 and 176, and such indication is respectfully requested.

Thus, based on the foregoing, the Applicant respectfully requests withdrawal of the 35 U.S.C. §§ 102 and 103 rejections of claims 166-185.

### **Conclusion**

Based on the above remarks, the Applicant submits that claims 166-185 are allowable. Additional reasons in support of patentability exist, but such reasons are omitted in the interests of clarity and brevity. The Applicant thus respectfully requests allowance of claims 166-185.

The Applicant believes no fees are due with respect to this filing. However, should the Office determine fees are necessary, the Office is hereby authorized to charge Deposit Account No. 21-0765 accordingly.

Respectfully submitted,

/Kyle J. Way/

**SIGNATURE OF PRACTITIONER**

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